

Shareholder Privacy Notice

1 October 2025

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1. Introduction

This Privacy Notice (“**Notice**”) explains what personal information we collect and use about you, who we share it with and how you can exercise your data protection rights.

This Notice applies to the personal information we collect and process to manage and administer shareholder interests in the Bank of London and The Middle East Holdings Ltd and applies to all current and former shareholders. You should read this Notice in conjunction with any information we provide in connection with your shareholding.

Where you provide personal information about third-party individuals (e.g. dependants, joint account holders, or your representatives), you should also direct these individuals to this Notice to ensure they are aware of how we will use their information.

It is important that the personal information we hold about you is accurate and complete to the best of your knowledge, as we rely on this information to manage and administer your shareholding interests. You should therefore inform us of any changes to your information as soon as possible by contacting us at: shareholders@blme.com.

Some of the links on our websites, mobile applications and email communications may direct you to other third-party websites that are not under our control, such as partner networks, advertisers, social media networks or other group companies. These third parties have their own separate privacy notices explaining how they collect and process your information and you should read these notices to ensure you are content with how these third parties may use your information.

2. Who we are

Your personal information is collected by:

- Bank of London and The Middle East Holdings Ltd, a company registered in England & Wales with its company registered number as 08503102 and registered office address at 20 Churchill Place, Canary Wharf, London, E14 5HJ.

Bank of London and The Middle East Holdings Ltd is part of the Boubyan Bank Group and acts as the Controller of your personal information for the purposes of the applicable data protection laws. In this Notice we refer to ourselves as “**we**”, “**us**”, “**our**” or “**BLME**”.

3. How to contact us

If you have any questions about the contents of this Notice or would like to exercise your data protection rights, please contact our Data Protection Officer at:

Data Protection Officer
BLME
20 Churchill Place
Canary Wharf
London
E14 5HJ

email: dpo@blme.com

4. Complaints

If you have any concerns about the way we collect and process your personal information, please contact our Data Protection Officer in the first instance, using the contact details provided in section 3 (How to contact us).

You also have the right to complain to the relevant data protection regulator at any stage.

The UK Information Commissioner's Office can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Tele: 03031231113

Website: ico.org.uk

5. Collecting personal information

We collect personal information in accordance with applicable laws, where necessary to manage and administer our shareholder interests and comply with our legal and regulatory obligations.

You are required to provide any information we reasonably require to enable us to comply with our legal and regulatory obligations and manage and administer your shareholding.

5.1 Information we collect

We may collect personal information from you directly or indirectly through your agent, stockbroker or share plan administrator. This information will generally include the categories of personal information described below.

Categories	Description
Personal details	<ul style="list-style-type: none">• Name• Date of birth
Contact details	<ul style="list-style-type: none">• Postal address• email address• Telephone number• Where you interact with us in a business-to-business context, your business contact details
Shareholding details	<ul style="list-style-type: none">• Shareholder reference number• Details of shares held• Voting instructions

5.2 Information we collect automatically

We collect personal information about you automatically, e.g. when you use our website. This information will generally include the categories information described below.

Categories	Description
Online identifiers	<ul style="list-style-type: none">• IP address• MAC address• Device ID and Device settings• Operating system• Geographic location
Online analytics information	<ul style="list-style-type: none">• Date and time of your visit to our website• Internet browser type and version• Internet browser settings• Specific website pages you visit• How you engage with our website content generally
Cookies	<p>We use cookies to collect information about you when you use our website or mobile applications. When we collect this information, we either collect it with your consent or because it is strictly necessary to process the information to ensure our website and mobile applications operate effectively.</p> <p>For further information about how we use cookies, please see our separate Cookie Notice.</p>

6. How we use your personal information

6.1 Lawful bases for processing

We are required to satisfy at least one of the lawful bases for processing personal information set out in the applicable data protection laws, before collecting and processing information about you. When we collect and process personal information, we rely on one or more of the lawful bases described below.

Lawful bases	Description
Contract	Where the processing is necessary to fulfil our obligations in any agreements we enter into with you
Legal obligation	Where the processing is necessary to comply with our legal and regulatory obligations
Legitimate interest	Where the processing is necessary to pursue legitimate interests

6.2 How we use your personal information

This section describes how we use your personal information and which of the lawful bases (described above in section 6.1) we rely on to carry out the processing.

6.2.1 Manage shareholder interests

We process your information to manage and administer your shareholding.

We do this by keeping our shareholder register up to date, communicating with you to provide relevant information (e.g. meeting materials and annual reports), paying dividends and allowing you to exercise your voting rights.

We carry out this processing to comply with our contractual and legal obligations and to pursue our legitimate interest in managing and administering our shareholder interests.

6.2.2 Product and service improvement

We process your information to help improve our products or services.

We do this by analysing your interactions with our products or services, including our website and mobile applications, and making improvements to ensure we are meeting your expectations and the expectations of our website users generally. Where you give us your permission, we use cookies or similar technologies on our websites and mobile applications to carry out some of this processing.

We carry out this processing with your consent or where necessary to pursue our legitimate interest in improving the products and services we offer.

6.2.3 Preventing and detecting crime

We process your information to prevent and detect crime.

We carry out this processing to comply with our legal obligations and to pursue our legitimate interest in protecting our business and preventing and detecting crime.

6.2.4 Protecting our rights

We process your information to protect and defend our legal rights.

We do this by enforcing our rights under any agreements you have entered into with us, protecting our intellectual property, defending complaints, disputes or associated litigation and collecting any outstanding payments or debts.

If we are sold to, acquired by or merged with another organisation, in whole or in part we may transfer your information to the successor of our business.

We carry out this processing to and to pursue our legitimate interest in enforcing our legal rights to protect our business.

7. Who we share your personal information with

7.1 Data sharing purposes

Where necessary, we may share some of your information with third parties in order to:

- comply with your instructions, e.g. where a third party has requested the information and you have given your permission for the information to be disclosed
- comply with our legal and regulatory obligations
- exercise or protect our rights, or
- where we have another legitimate business reason.

7.2 Fraud prevention agencies

We may share some of your personal information with fraud prevention agencies, where necessary to prevent and detect crime. This information may have been collected from you directly or indirectly from other third parties. We and fraud prevention agencies may also allow law enforcement agencies to access and use your information to detect, investigate and prevent crime.

Fraud prevention agencies can hold your personal information for different periods of time. Where you are considered to pose a fraud or money laundering risk, your information can be retained for up to six years.

To find out more about fraud prevention agencies and how they process your information, please refer to the CIFAS privacy notice (www.cifas.org.uk/fpn), which explains how fraud prevention agencies use your information.

8. How we protect your information

We have implemented appropriate technical and organisational security measures to keep your information secure, including pseudonymisation, encryption and other security measures. These security measures are designed prevent unauthorised access, loss, misuse or alteration of your information.

9. How long we keep your information

We keep your information for as long as you remain a shareholder and for a predefined period when you cease to hold shares in BLME. We may also retain your information to comply with our legal and regulatory obligations, such as anti-money laundering regulations.

We generally retain your information for ten years following the end of our relationship with you. However, we may retain your information for a longer period if this is necessary to comply with our legal and regulatory obligations, prevent and detect crime or manage and administer any ongoing complaints or disputes, including any associated litigation.

10. International transfers

Where necessary, we may transfer your personal information to other countries and territories outside the UK, including to some countries and territories that may not be considered to provide an equivalent level of protection for information. However, where we make such transfers we will put in place appropriate safeguards, such as approved standard contractual clauses and, where necessary, other technical and organisational measures, to ensure the information is afforded an adequate level of protection.

If you require further information about the international transfers we make involving your information and the safeguards we have in place, please contact our Data Protection Officer, using the contact details provided in section 3 (How to contact us).

11. Your information rights

11.1 Information rights

You have a number of rights in relation to the personal information that we hold about you. The availability of these rights and the ways you can use them are explained in more detail below.

Information rights	Description
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Access	You can ask us if we are processing information about you and, where that is the case, request a copy of the information
Rectification	You can ask us to rectify any inaccurate or incomplete information we are holding about you

Erasure	You can ask us to erase information we are holding about you. However, this is not an absolute right, and we may refuse a request for erasure if we need to keep your information
Restriction	You can ask us to restrict the processing of information about you in certain circumstances. However, this is not an absolute right, and we may refuse a request for restriction where appropriate
Portability	You can ask us to transfer some of the information we are holding about you to a third party, in a structured machine-readable format
Object	You can object to the processing of information about you in certain circumstances. However, this is not an absolute right, and we may refuse to cease processing the information, where there are compelling legitimate grounds to continue the processing

11.2 Exercising your information rights

If you would like to exercise your data protection rights, please contact our Data Protection Officer, using the contact details provided in section 3 (How to contact us).

It is important to note, however, that some of the aforementioned rights are not absolute and can only be exercised in certain circumstances. If we are unable to fulfil an information rights request, we will write to you explain the reason for refusal.

12. Changes to this Notice

This Notice is not contractual and will be updated from time to time to ensure it continues to accurately reflect the way we collect and process personal information. Any updates or changes to this notice will be published on our website here. You should therefore periodically review this Notice to understand how we collect and use your information.

We will also notify you in advance of any material changes that we make to the Notice, so you understand what impact any changes may have on you and how you can exercise your rights.